

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

JOHN STEEN, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

**REQUESTS FOR PRODUCTION OF DOCUMENTS OF THE
TEXAS STATE CONFERENCE OF NAACP BRANCHES
AND THE MEXICAN AMERICAN LEGISLATIVE CAUCUS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs The Texas State Conference of NAACP Branches and the Mexican American Legislative Caucus of the Texas House of Representatives (“Plaintiffs”) hereby request that Defendants the State of Texas, John Steen, and Steve McCraw (“Defendants”) identify and produce all documents and items responsive to the following Requests for Production (“Requests”) to Ezra Rosenberg, Dechert LLP, 902 Carnegie Center, Suite 500, Princeton, New Jersey 08540-6531 pursuant to the Rules or any lesser time ordered by the Court or agreed to by the parties.

These Requests are continuing in nature as provided by Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

1. All documents, items, databases, writings, recordings, and other materials responsive to United States’ First Set of Requests for Production of Documents propounded on Defendants on November 26, 2013.

2. All documents, items, databases, writings, recordings, and other materials responsive to United States' Amended Second Set of Requests for Production of Documents propounded on Defendants on December 16, 2013.

3. With regard to the Department of Public Safety's responsibility to issue driver's licenses, all documents related to:

a. the location of all Texas offices that are issuing driver's licenses (regular offices and "megacenters"), the date each such office began issuing driver's licenses, the hours of each such office, the number of full and part-time staff employed at each office, the user experience of individuals who go to such an office to obtain a driver's license (*e.g.*, documents related to wait times), and the geographic region served by each office;

b. plans to increase or reduce the number of Texas offices that are issuing or plan to issue driver's licenses, including the reason or reasons for the increase or reduction and documents related to the budget for such offices;

c. plans to increase or reduce the operating hours of any Texas office that is issuing or plans to issue driver's licenses, including plans as they relate to individual offices, the decisions to increase or decrease operating hours at specific offices, and the impact of an increase or decrease in hours on the budget of individual offices or the Department of Public Safety; and

d. plans to open any Department of Public Safety "megacenters," including the choice of location, any analysis on which that decision was reached, and the anticipated dates on which each megacenter will open, and all documents related to any megacenter, including those related to the choice of location, that has opened anywhere in Texas since January 1, 2008.

4. With regard to the Department of Public Safety's responsibility to issue personal identification cards, all documents related to:

a. the location of all Texas offices that are issuing personal identification cards (regular offices and "megacenters"), the date each such office began issuing personal identification cards, the hours of each such office, the number of full and part-time staff employed at each office, the user experience of individuals who go to such an office to obtain a personal identification card (*e.g.*, documents related to wait times), and the geographic region served by each office;

b. plans to increase or reduce the number of Texas offices that are issuing or plan to issue personal identification cards, including the reason or reasons for the increase or reduction and documents related to the budget for such offices;

c. plans to increase or reduce the operating hours of any Texas office that is issuing or plans to issue personal identification cards, including plans as they relate to individual offices, the decisions to increase or decrease operating hours at specific offices, and the impact of an increase or decrease in hours on the budget of individual offices or the Department of Public Safety; and

d. plans to open any Department of Public Safety "megacenters," including the choice of location, any analysis on which that decision was reached, and the anticipated dates on which each megacenter will open, and all documents related to any megacenter, including those related to the choice of location, that has opened anywhere in Texas since January 1, 2008.

5. With regard to the Department of Public Safety's responsibility to issue licenses to carry a concealed handgun, all documents related to:

a. the location of all Texas offices that are issuing licenses to carry a concealed handgun (regular offices and “megacenters”), the date each such office began issuing such licenses, the hours of each such office, the number of full and part-time staff employed at each office, the user experience of individuals who go to such an office to obtain a license to carry a concealed handgun (*e.g.*, documents related to wait times), and the geographic region served by each office;

b. plans to increase or reduce the number of Texas offices that are issuing or plan to issue licenses to carry a concealed handgun, including the reason or reasons for the increase or reduction and documents related to the budget for such offices;

c. plans to increase or reduce the operating hours of any Texas office that is issuing or plans to issue licenses to carry a concealed handgun, including plans as they relate to individual offices, the decisions to increase or decrease operating hours at specific offices, and the impact of an increase or decrease in hours on the budget of individual offices or the Department of Public Safety; and

d. plans to open any Department of Public Safety “megacenters,” including the choice of location, any analysis on which that decision was reached, and the anticipated dates on which each megacenter will open, and all documents related to any megacenter, including those related to the choice of location, that has opened anywhere in Texas since January 1, 2008.

6. With regard to Request No. 18 in the United States’ First Set of Requests for Production of Documents, provide – in addition to the documents identified in that request – all documents that relate to the user experience of individuals who go to an office to obtain an Election Identification Certificate (*e.g.*, documents related to wait times).

7. With regard to Request No. 22 in the United States' First Set of Requests for Production of Documents, provide – in addition to the documents identified in that request – all documents related to any and all allegations concerning in-person voter impersonation or other in-person voter fraud that occurred in the State of Texas from January 1, 2000 to December 31, 2003.

8. With regard to Request No. 23 in the United States' First Set of Requests for Production of Documents, provide – in addition to the documents identified in that request – all documents related to any and all allegations concerning instances of voting in Texas by persons who are not United States citizens from January 1, 2000 to the December 31, 2003.

9. With regard to Request No. 24 in the United States' First Set of Requests for Production of Documents, provide – in addition to the documents identified in that request – all documents related to any and all training sessions regarding the provisions of SB 14 and plans to conduct training sessions in 2014 (*e.g.*, in-person training and training conducted using the internet), including (but not limited to):

a. all documents distributed or displayed as part of the training (*e.g.*, guidelines, manuals, power-point presentations, and videos);

b. all documents concerning the development of the training and the training materials; and

c. locations and times of the training sessions.

Respectfully submitted this 2nd day of January, 2014.

s/ Ezra Rosenberg

Ezra D. Rosenberg
Michelle H. Yeary
Dechert LLP
902 Carnegie Center, Suite 500
Princeton, New Jersey 08540-6531
ezra.rosenberg@dechert.com

Wendy Weiser
Myrna Pérez
Vishal Agraharkar
Jennifer Clark
The Brennan Center for Justice at NYU Law School
161 Avenue of the Americas, Floor 12
New York, New York 10013-1205
wendy.weiser@nyu.edu
myrna.perez@nyu.edu
vishal.agraharkar@nyu.edu
jennifer.clark@nyu.edu

Robert A. Kengle
Mark A. Posner
Sonia Kaur Gill
Erandi Zamora
Lawyers' Committee for Civil Rights Under Law
1401 New York Avenue, N.W., Suite 400
Washington, D.C. 20005
mposner@lawyerscommittee.org

Clay Bonilla
Daniel G. Covich
The Law Offices of William Bonilla, P.C.
2727 Morgan Ave.
Corpus Christi, Texas 78405
claybonilla@hotmail.com
Daniel@bonillalaw.com

Steven B. Weisburd
Amy L. Rudd
Lindsey B. Stelcen
Dechert LLP
500 W. 6th Street, Suite 2010
Austin, Texas 78701
lindsey.stelcen@dechert.com

Gary Bledsoe
PotterBledsoe, L.L.P.
316 West 12th Street, Suite 307
Austin, Texas 78701
garybledsoe@sbcglobal.net

Robert Notzon
The Law Office of Robert Notzon
1502 West Avenue
Austin, Texas 78701
Robert@NotzonLaw.com

Jose Garza
Law Office of Jose Garza
7414 Robin Rest Drive
San Antonio, Texas 98209
garzapalm@aol.com

Kim Keenan
Marshall Taylor
Victor Goode
NAACP
4805 Mt. Hope Drive
Baltimore, Maryland 21215
Telephone: (410) 580-5120
kkeenan@naacpnet.org
mtaylor@naacpnet.org
vgoode@naacpnet.org

CERTIFICATE OF SERVICE

I hereby certify that on January 2, 2014, I served a true and correct copy of the foregoing via electronic mail on the following counsel of record:

John B. Scott
Office of the Texas Attorney General
john.scott@texasattorneygeneral.gov

Counsel for Defendants

Chad W. Dunn
Kembel Scott Brazil
Brazil & Dunn
chad@bradzilanddunn.com
scott@bazilanddunn.com

Neil G. Baron
Law Offices of Neil G. Baron
neil@ngbaronlaw.com

Armand Derfner
Derfner, Altman, & Wilborn
aderfner@dawlaw.com

Luiz Roberto Vera, Jr.
lrvlaw@sbcglobal.net

Counsel for Veasey Plaintiffs

Rolando L. Rios
Law Offices of Rolando L. Rios
rrios@rolandorioslaw.com

*Counsel for Texas Association of Hispanic
County Judges and County Commissioners
Plaintiff-Intervenors*

Christina Swarns
Ryan P. Haygood
Natasha M. Korgaonkar
Leah C. Aden
NAACP Legal Defense and Educational
Fund, Inc.
cswarns@naacpldf.org
rhaygood@naacpldf.org
nkorgaonkar@naacpldf.org
laden@naacpldf.org

Danielle Conley
Jonathan Paikin
Kelly P. Dunbar
Sonya L. Lebsack
WilmerHale LLP
danielle.conley@wilmerhale.com
jonathan.paikin@wilmerhale.com
kelly.dunbar@wilmerhale.com
sonya.lebsack@wilmerhale.com

*Counsel for Texas League of Young Voters
Plaintiff-Intervenors*

T. Christian Herren, Jr.
Meredith Bell-Platts
Elizabeth S. Westfall
Bruce I. Gear
Jennifer L. Maranzano
Anna M. Baldwin
Daniel J. Freeman
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
Room 7254 NWB
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Kenneth Magidson
United States Attorney
Southern District Of Texas

John A. Smith III
Assistant United States Attorney
800 N. Shoreline, Suite 500
Corpus Christi, Texas 78401

Counsel for United States of America

s/ Michelle Hart Yeary
Michelle Hart Yeary
Dechert LLP
902 Carnegie Center, Suite 500
Princeton, New Jersey 08540-6531
michelle.yeary@dechert.com